Bay Area Air Quality Management District

939 Ellis Street San Francisco, CA 94109 (415) 771-6000

Proposed

MAJOR FACILITY REVIEW PERMIT

U.S. Pipe and Foundry Company Site #A0083

Site Address:

1295 Whipple Road Union City, CA 94587

Mailing Address:

1295 Whipple Road Union City, CA 94587 (510) 441-5865

Responsible Official - James E. Kelly, Plant Manager **Facility Contact -** Rodney M. Helfrich, Environmental Engineer

Type of Facility:	Ductile Iron Foundry		
Primary SIC:	3321		
Product:	Ductile Iron Pressure Pip	e	
ISSUED BY THE BAY A	REA AIR QUALITY MA	NAGEMENT DISTRICT	
Ellen J. Garvey, Air Pollution	on Control Officer	Date	

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I. STANDARD CONDITIONS

Administrative Requirements

The permit holder shall comply with all applicable requirements in BAAQMD Regulation 1 - General Provisions and Definitions (11/3/93); SIP Regulation 1 - General Provisions and Definitions (3/17/82); BAAQMD Regulation 2, Rule 1 - Permits, General Requirements (6/7/95); SIP Regulation 2, Rule 1 - Permits, General Requirements (2/1/95); BAAQMD Regulation 2, Rule 2 - Permits, New Source Review (6/7/95); SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration (12/1/82); and BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking (6/15/94).

Conditions to Implement Regulation 2, Rule 6, Major Facility Review

This Major Facility Review Permit expires on *[ENTER DATE 5 YEARS AFTER ISSUANCE]*. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than *[6 MONTHS PRIOR TO EXPIRATION]* and no earlier than *[ONE YEAR PRIOR TO EXPIRATION]*. If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after *[DAY PRIOR TO EXPIRATION]*. (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, §4.2)

The permit holder shall comply with all conditions of this permit. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)

In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)

The filing of a request by the facility for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)

This permit does not convey any property rights of any sort, nor any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)

The permit holder shall supply any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit within 30 days. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)

Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from

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I. Standard Conditions (continued)

the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)

The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)

Minor Permit Modification Procedures

Notwithstanding the provisions set forth in Regulation 2, Rule 6, Major Facility Review, Section 411, Reports to EPA and Public Petitions for Major Facility Review Permits; Section 412, Public Participation, Major Facility Review Permit Issuance; and Section 414, Minor Permit Modification Procedures:

- 1. Advance public notice and EPA review shall not be required for any proposed minor permit modification. Once per calendar quarter, the District shall publish a list that includes any minor permit modification issued during the previous quarter.
- 2. For any minor permit modification involving an emission increase from any source or group of sources equal to or greater than: 5 tons per year of a regulated air pollutant; 2 tons per year of any single hazardous air pollutant; and 5 tons per year of any combination of hazardous air pollutants, the District shall provide to EPA a copy of each relevant application or a summary of the application, and a copy of each final permit revision.
- 3. For any minor permit modification involving an emission increase from any source or group of sources of less than: 5 tons per year of a regulated air pollutant, 2 tons per year of any single hazardous air pollutant; and 5 tons per year of any combination of hazardous air pollutants, the District shall not submit a copy of the relevant application, a summary of the application, or final permit revision to EPA. EPA shall not object to any permit modification involving an emission increase below the levels described herein. Such permit modifications shall be incorporated as attachments to this permit during the remaining term of the permit, and incorporated into the body of the permit as part of the five-year permit renewal.

Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

Records

Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

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I. Standard Conditions (continued)

Monitoring Reports

All required monitoring reports must be submitted to the District at least once every six months. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. (Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. (Regulation 2-6-409.9; MOP Volume II, Part 3, §4.15)

Emergency Provisions

The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)

The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit caused by conditions beyond the permit holder's reasonable control by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. Any variance granted by the Hearing Board from any term or condition of this permit which lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)

Notwithstanding the foregoing, the granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement unless the Major Facility Review Permit has been modified pursuant to Regulation 2, Rule 6. (MOP Volume II, Part 3, §4.8)

Severability

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

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II. EQUIPMENT LIST

A. Permitted Source List

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2-1-302.

Table II-A

S-#	Description	Make or Type	Model	Capacity
S-1	Cupola	U.S. Pipe	None	55 ton/hr, 182 MM
				BTU/hr
S-4	Ductile Treating Unit	U.S. Pipe	None	55 ton/hr,
S-5	Ladle Lancing	U.S. Pipe	None	40 ton/hr
S-7	Mold Sandblast	Pauli & Griffin	24S	0.4 ton/hr
S-8	Bell Blowout	U.S. Pipe	None	38 ton/hr
S-15	Annealing Oven	U.S. Pipe	None	55 ton/hr, 88 MM BTU/hr
S-16	Pneumatic Cement Transport System	U.S. Pipe	None	32.5 ton/hr
S-17	Surface Coater	Unknown	Unknown	Unknown
S-26	Paint Storage Tank #1	Underground, Fixed-	Unknown	10,000 gallon
	D	Roof		10.000 11
IS-27	Paint Storage Tank #2	Underground, Fixed- Roof	Unknown	10,000 gallon
S-32	Pneumatic Dust Transport System	U.S. Pipe	None	1.3 ton/hr
S-33	Gasoline Dispensing Facility, non-retail (GDF#7675)	Unknown	Unknown	1 nozzle
S-39	Ductile Treating Unit	Fischer	EMK	55 ton/hr
S-40	Portable Abrasive Blasting Unit #1	P & G	Unknown	740 lb/hr
S-41	Portable Abrasive Blasting Unit #2	Clemco	Unknown	450 lb/hr
S-32000	Miscellaneous Fuel Burning Sources	U.S. Pipe	Unknown	Unknown

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Abatement Device List B.

Table II-B

A-#	Description	Source(s)	Applicable	Operating	Required
		Controlled	Requirement	Parameters	Efficiency
A-3	Cupola Afterburner	S-1 Cupola	District Cond #2274, part 3	Minimum operating temperature of 1550°F	None
A-5	Mold Sandblast Baghouse	S-7 Mold Sandblast	BAAQMD Reg. 6-310	None	Grain loading not to exceed 0.15 gr/dscf
A-9	Pneumatic Cement Transport Baghouse	S-16 Pneumatic Cement Transport	BAAQMD Reg. 6-310	None	grain loading not to exceed 0.15 gr/dscf
A-10	Ductile Treater Baghouse	S-4 and S- 39 Ductile Treating Units	BAAQMD Reg. 6-301	None	grain loading not to exceed 0.15 gr/dscf
A-12	Cupola Baghouse	S-1 Cupola & S-5 Ladle Lancing & S-6 Brick Saw	District Cond #2274, part 4	Pressure drop across bags not to exceed 6 inches water column	None
A-19	Dust Collector	S-32 Pneumatic Dust Transport	District Condition #2676, part 3	None	grain loading shall not exceed 0.10 gr/dscf
A-20	Bell Blowout Dust Collector	S-8 Bell Blowout	District Condition #2212, part 2	Pressure drop across bags not to exceed 6 inches water column	None

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III. GENERALLY APPLICABLE EMISSION REQUIREMENTS

The permit holder shall comply with the applicable requirements specified in the BAAQMD and SIP Rules and Regulations cited below. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Part IV, Applicable Requirements, of this permit. The dates in parenthesis in the Title column are the dates of adoption or most recent amendment or for SIP requirements, the most recent date of EPA approval.

Table III

Applicable Requirement	Regulation Title or Description of Requirement	SIP-approved/ FE (Y/N)	Sources/Operations Covered
BAAQMD Regulation 1	General Provisions and Definitions (11/3/93)	Y ¹	all
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	Y	facility
BAAQMD Regulation 5	Open Burning (11/2/94)	Y¹	facility
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann Number 1 Limitation	N ¹	all, except temporary sandblasting, open fires, and operations subject to BAAQMD §6-303, 304, or 306
6-303	Ringelmann Number 2 Limitation	Y	sources listed in subsections
6-305	Visible Particles	Y	all, except temporary sandblasting and open fires
6-310	Particulate Weight Limitation	Y	all, except temporary sandblasting and open fires

(continued)

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III. Generally Applicable Emission Requirements (continued)

Table III (continued)

Applicable Requirement	Regulation Title or Description of Requirement	SIP-approved/ FE (Y/N)	Sources/Operations Covered
6-401	Appearance of Emissions	Y	all
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N	all
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y	solvent cleaning operations, except operations subject to Reg. 8-2 or 8-4 which meet minimum abatement requirements
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (12/20/95)	Y ¹	application of architectural coating
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	Y ¹	application of or specifications for aerosol products
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (12/20/95)	N	application or specification of adhesive or sealant products
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91)	Y	asbestos surfacing/coating, installation, demolition, disposal
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	Y ¹	non-permanent abrasive blasting operations

There are differences between the current BAAQMD rule and the version of the rule in the SIP. For specific information, contact the District's Rule Development Section of the Enforcement Division. All sources must comply with <u>both</u> versions of the rule until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

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IV. APPLICABLE REQUIREMENTS

The permit holder shall operate in compliance with all requirements specified in the sections of the applicable rules and regulations and permit conditions cited below. The text of all permit conditions cited is included in Part VII, Permit Conditions, of this permit. All other text may be found in the regulations themselves. The dates in parenthesis in the Regulation Title column are the dates of adoption or most recent amendment or for SIP requirements, the most recent date of EPA approval.

Table IV-A

S-1 Cupola

	5-1 Cupota	SIP-approved/	Future
Applicable	Regulation Title or	FE	Effective
Requirement	Description of Requirement	(Y/N)	Date
_	•	(1/14)	Date
BAAQMD	Particulate Matter and Visible Emissions (7/11/90)		
Regulation 6		1	
6-301	Ringelmann No.1 Limitation	N ¹	
6-302	Opacity Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	General Operations	Y	
SIP	PROVISIONS NO LONGER IN CURRENT RULE		
Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No.1 Limitation	Y^2	
BAAQMD	Sulfur Dioxide (3/15/95)		
Regulation 9,			
Rule 1			
9-1-301	Limitations on Ground Level Concentrations	Y	
9-1-304	Fuel Burning (Liquid and Solid Fuels)	Y	
BAAQMD	Lead (3/17/82)		
Regulation			
11, Rule 1			
11-1-301	Daily Limitation	Y	
11-1-302	Ground Level Concentration Without Background	Y	

(continued)

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IV. Applicable Requirements (continued)

Table IV-A (continued)

S-1 Cupola

Applicable	Regulation Title or	SIP-approved/ FE	Future Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD Condition #2274			
part 1	A-3 Afterburner and A-12 Baghouse Abatement Requirement (basis: cumulative increase)	Y	
part 2	Limitation on Daily Hours of Operation (basis: cumulative increase)	Y	
part 3	Minimum A-3 Afterburner Combustion Chamber Temperature (basis: cumulative increase)	Y	
part 4	A-12 Baghouse maintenance requirement (basis: cumulative increase)	Y	
part 5	A-3 Afterburner temperature monitor and recorder (basis: cumulative increase)	Y	
part 6	Recordkeeping Requirement (basis: cumulative increase)	Y	

This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

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IV. Applicable Requirements (continued)

Table IV-B

S-4 Ductile Treating Unit

		SIP-approved/	Future
Applicable	Regulation Title or	FE	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Particulate Matter and Visible Emissions (7/11/90)		
Regulation 6			
6-301	Ringelmann No.1 Limitation	N	
6-302	Opacity Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	General Operations	Y	
SIP	PROVISIONS NO LONGER IN CURRENT RULE		
Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No.1 Limitation	\mathbf{Y}^2	
BAAQMD	Lead (3/17/82)		
Regulation			
11, Rule 1			
11-1-301	Daily Limitation	Y	
11-1-302	Ground Level Concentration Without Background	Y	
BAAQMD			
Condition			
#1783			
part 1	Sulfur Dioxide Mass Emission Limit (basis: cumulative increase)	Y	
part 2	A-10 Baghouse Abatement Requirement	Y	
	(basis: cumulative increase)		
part 3	A-10 pressure differential gauge (basis: cumulative increase)	Y	
part 4	A-10 Baghouse discharge requirement (basis: Regulation 6-301)	N	
part 5	A-10 Baghouse maintenance requirement	Y	
	(basis: cumulative increase)		

This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

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IV. Applicable Requirements (continued)

Table IV-C

S-5 Ladle Lancing S-6 Brick Saw S-7 Mold Sandblast

S-16 Pneumatic Cement Transport System

		SIP-approved/	Future
Applicable	Regulation Title or	FE	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Particulate Matter and Visible Emissions (7/11/90)		
Regulation 6			
6-301	Ringelmann No.1 Limitation	N	
6-302	Opacity Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	General Operations	Y	
SIP	PROVISIONS NO LONGER IN CURRENT RULE		
Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No.1 Limitation	Y^2	

This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

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IV. Applicable Requirements (continued)

Table IV-D

S-8 Bell Blowout

		SIP-approved/	Future
Applicable	Regulation Title or	FE	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Particulate Matter and Visible Emissions (7/11/90)		
Regulation 6			
6-301	Ringelmann No.1 Limitation	N	
6-302	Opacity Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	General Operations	Y	
SIP	PROVISIONS NO LONGER IN CURRENT RULE		
Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No.1 Limitation	Y^2	
BAAQMD			
Condition			
#2212			
part 1	A-17 Baghouse Abatement Requirement	Y	
	(basis: cumulative increase)		
part 2	A-17 Baghouse maintenance requirement	Y	
	(basis: cumulative increase)		
part 3	A-17 Baghouse pressure drop gauge (basis: cumulative increase)	Y	

This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

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IV. Applicable Requirements (continued)

Table IV-E

S-15 Annealing Oven

		SIP-approved/	Future
Applicable	Regulation Title or	FE	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Particulate Matter and Visible Emissions (7/11/90)		
Regulation 6			
6-301	Ringelmann No.1 Limitation	N	
6-302	Opacity Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	General Operations	Y	
SIP	PROVISIONS NO LONGER IN CURRENT RULE		
Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No.1 Limitation	Y^2	
BAAQMD	Sulfur Dioxide (3/15/95)		
Regulation 9,			
Rule 1			
9-1-301	Limitations on Ground Level Concentrations	Y	
9-1-302	General Emission Limitation	Y	

This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

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IV. Applicable Requirements (continued)

Table IV-F

S-17 Surface Coater

		SIP-approved/	Future
Applicable	Regulation Title or	FE	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Surface Coating of Miscellaneous Metal Parts and Products		
Regulation 8,			
Rule 19			
8-19-302	Limits	Y	
8-19-313	Spray Application Equipment Limitations	Y	
8-19-320	Solvent Evaporative Loss Minimization	Y	

Table IV-G

S-26 Paint Storage Tank #1 S-27 Paint Storage Tank #2

		SIP-approved/	Future
Applicable	Regulation Title or	FE	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Storage of Organic Liquids (1/1/93)		
Regulation 8,			
Rule 5			
8-5-301	Standards - Storage Tanks Smaller than 150m ³	Y	
8-5-328	Tank Cleaning Requirements	Y	
8-5-501	Records	Y	

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IV. Applicable Requirements (continued)

Table IV-H

S-32 Pneumatic Dust Transport System

	5-52 Theumatic Dust Transport System		
		SIP-approved/	Future
Applicable	Regulation Title or	FE	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Particulate Matter and Visible Emissions (7/11/90)		
Regulation 6			
6-301	Ringelmann No.1 Limitation	N	
6-302	Opacity Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	General Operations	Y	
SIP	PROVISIONS NO LONGER IN CURRENT RULE		
Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No.1 Limitation	Y^2	
BAAQMD			
Condition			
#2676			
part 1	A-19 Baghouse Abatement Requirement	Y	
	(basis: cumulative increase)		
part 2	Limitation on Daily hours of operation	Y	
	(basis: cumulative increase)		
part 3	A-19 Baghouse Grain Loading Limit (basis: BACT)	Y	

This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

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Applicable Requirements (continued) IV.

Table IV-I

S-33 Gasoline Dispensing Facility (Non-Retail)

	S-55 Gasonne Dispensing Facility (Non-R	SIP-approved/	Future
Applicable	Regulation Title or	FE	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	-		
Regulation 8,	Organic Compounds - Gasoline Dispensing Facilities (6/1/94)		
Rule 7			
8-7-112	Phase II Exemptions	Y	
8-7-112.7	Exemption - Older Facilities with Low Annual Throughput	Y	
8-7-113	Tank Gauging and Inspection Exemption	Y	
8-7-114	Stationary Tank Testing Exemption	Y	
8-7-301	Phase I Requirements	Y	
8-7-301.1	Requirement for CARB Phase I System	Y	
8-7-301.2	Installation of Phase I Equipment per CARB Requirements	Y	
8-7-301.3	Submerged Fill Pipes	Y	
8-7-301.4	P-V Valves on All Open Vent Pipes	Y	
8-7-301.5	Maintenance of Phase I Equipment per Manufacturers Guidelines	Y	
8-7-301.6	Leak-Free, Vapor-Tight	Y	
8-7-301.7	Poppetted Drybreaks	Y	
8-7-303	Topping Off	Y	
8-7-304	Certification Requirements	Y	
8-7-308	Operating Practices	Y	
8-7-312	Removal of Gasoline	Y	
8-7-401	Equipment Installation and Modification	Y	
8-7-404	Certification of New Installations	Y	
8-7-501	Burden of Proof	Y	
8-7-502	Right of Access	Y	
BAAQMD			
Condition #708			
part 1	Annual throughput (basis: Regulation 8-7-112.7)	Y	

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IV. Applicable Requirements (continued)

Table IV-J

S-39 Ductile Treating Unit

	5-59 Ducthe Treating Unit		
		SIP-approved/	Future
Applicable	Regulation Title or	FE	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Particulate Matter and Visible Emissions (7/11/90)		
Regulation 6			
6-301	Ringelmann No.1 Limitation	N	
6-302	Opacity Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	General Operations	Y	
SIP	PROVISIONS NO LONGER IN CURRENT RULE		
Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No.1 Limitation	Y^2	
BAAQMD	Lead (3/17/82)		
Regulation			
11, Rule 1			
11-1-301	Daily Limitation	Y	
11-1-302	Ground Level Concentration Without Background	Y	
BAAQMD			
Condition			
#12262			
part 1	Material throughput limitation (basis: cumulative increase)	Y	
part 2	A-10 Baghouse Abatement Requirement	Y	
	(basis: cumulative increase)		
part 3	Recordkeeping Requirement	Y	
part 3a	Annual Material throughput records (basis: cumulative increase)	Y	

This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

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IV. Applicable Requirements (continued)

Table IV-K

S-40 Portable Abrasive Blasting Unit #1 S-41 Portable Abrasive Blasting Unit #2

	· <i>L</i>		
		SIP-approved/	Future
Applicable	Regulation Title or	FE	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Particulate Matter and Visible Emissions (7/11/90)		
Regulation 6			
6-301	Ringelmann No.1 Limitation	N	
6-302	Opacity Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	General Operations	Y	
SIP	PROVISIONS NO LONGER IN CURRENT RULE		
Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No.1 Limitation	Y^2	
BAAQMD	Sandblasting (7/11/90)		
Regulation			
12, Rule 4			
12-4-301	Ringelmann 1 Limitation	Y	
12-4-302	Ringelmann 2 Limitation	Y	
12-4-305	Performance Standards for Abrasives	Y	
12-4-306	Certification of Abrasives	Y	
BAAQMD			
Condition			
#13321			
part 1	Material Throughput Limitation (basis: cumulative increase)	Y	
part 2	Blast Media Type (basis: cumulative increase)	Y	
part 3	Daily Material Throughput Recordkeeping Requirement	Y	
	(basis: cumulative increase)		

This section has been removed from BAAQMD Regulations because it has been superseded. Nevertheless, the source must comply with this regulation until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

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V. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

A. Source Specific Permit Conditions

Condition #2274:

For S-1 Cupola

- 1. Source S-1 Cupola shall not be operated unless it is abated by A-3 Afterburner and A-12 Baghouse. (basis: cumulative increase)
- 2. S-1 Cupola shall not be operated more than 11 hours per day. (basis: cumulative increase)
- 3. A-3 Afterburner combustion chamber temperature shall not operate below 1550 degrees Fahrenheit whenever S-1 Cupola is in operation. (basis: cumulative increase)
- 4. The A-12 Baghouse cloth filter bags shall be cleaned or replaced when the pressure drop across the bags exceeds 6 inches water column. (basis: cumulative increase)
- 5. The owner/operator of A-3 shall install and maintain a continuous temperature monitor and recorder to verify the A-3 Afterburner combustion chamber temperature. (basis: cumulative increase)
- 6. The owner/operator of S-1 shall maintain records of the daily hours of operation of S-1 and A-3 combustion chamber temperature in a District-approved log. The records shall be retained on site for a minimum of two years from the date of entry and made available to District representatives upon request. (basis: cumulative increase)

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V. Permit Conditions (conditioned)

A. Source Specific Permit Conditions (continued)

Condition #1783:

For S-4 Ductile Treating Station

- 1. The sulfur dioxide emissions from S-4 shall not exceed 150 pounds per day. If the District determines that this SO₂ emissions limit is exceeded, U.S. Pipe and Foundry shall install a District-approved dry SO₂ Scrubbing system. (basis: BACT)
- 2. S-4 Ductile Treating Station shall be abated by A-10 whenever S-4 is charged with molten iron. (basis: cumulative increase)
- 3. The operator of A-10 shall install and maintain a mechanical gauge that reads the static pressure differential across the filter bags in inches water column. (basis: cumulative increase)
- *4. Dust collected in A-10 Baghouse must only be discharged into closed containers. (basis: BAAQMD Regulation 6-301)
- 5. The A-10 cloth filter bags must be cleaned or replaced when the pressure drop across the bags reaches 6 inches of water column. (basis: cumulative increase)

Condition #2212:

For S-8 Bell Blow Out

- 1. S-8 shall not be operated unless it is abated by A-17 Baghouse. (basis: cumulative increase)
- 2. The cloth filter bags shall be cleaned when the pressure drop across the bags exceeds 6 inches water column. (basis: cumulative increase)
- 3. A mechanical gauge shall be installed so as to indicate, in inches water column, the static pressure differential across the bags. (basis: cumulative increase)

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V. Permit Conditions (conditioned)

A. Source Specific Permit Conditions (continued)

Condition #2676:

For S-32 Pneumatic Dust Transport System

- 1. S-32 shall not be operated unless it is abated by A-19 Baghouse. (basis: cumulative increase)
- 2. S-32 shall not be operated more than 11 hours per day. (basis: cumulative increase)
- 3. Particulate emissions from A-19 shall not exceed 0.10 grains per standard cubic foot. (basis: cumulative increase)

Condition #708:

For S-33 Gasoline Dispensing Facility (Non-Retail)

1. Pursuant to Regulation 8-7-112.7, this facility's annual gasoline throughput shall not exceed 60,000 gallons. (basis: BAAQMD Regulation 8-7-112.7)

Condition #12262:

For S-39 Fischer Converter

- 1. Total gray iron throughput at S-39 shall not exceed 150,000 tons during any consecutive twelve month period. (basis: cumulative increase)
- 2. S-39 Converter Vessel shall be abated by A-10 Baghouse whenever S-39 contains molten iron. (basis: cumulative increase)
- 3. The owner/operator of S-39 shall maintain monthly records of gray iron throughput in a District-approved log. These records shall be retained on site for a minimum of two years from the date of entry and made available to District personnel upon request. (basis: cumulative increase)

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V. Permit Conditions (conditioned)

A. Source Specific Permit Conditions (continued)

Condition #13321:

For S-40 Portable Abrasive Blasting Unit #1

- 1. Gross abrasive blast media (sand) throughput at S-40 shall not exceed 12 tons during any consecutive twelve month period nor 243 pounds during any calendar day. (basis: cumulative increase)
- 2. United States Pipe and Foundry shall notify the District in writing in any blast media other than sand is utilized at S-40. (basis: cumulative increase)
- 3. The owner/operator of S-40 shall maintain records of daily blast media throughput summarized on a monthly basis in a District-approved log. These records shall be retained on site for a minimum of two years from the date of entry and made available to District personnel upon request. (basis: cumulative increase)

For S-41 Portable Abrasive Blasting Units #2

- 1. Gross abrasive blast media (sand) throughput at S-41 shall not exceed 12 tons during any consecutive twelve month period nor 243 pounds during any calendar day. (basis: cumulative increase)
 - 2. United States Pipe and Foundry shall notify the District in writing in any blast media other than sand is utilized at S-41. (basis: cumulative increase)
 - 3. The owner/operator of S-41 shall maintain records of daily blast media throughput summarized on a monthly basis in a District-approved log. These records shall be retained on site for a minimum of two years from the date of entry and made available to District personnel upon request. (basis: cumulative increase)

B. Facility-wide Permit Conditions

None

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VI. APPLICABLE EMISSION LIMITS & COMPLIANCE MONITORING **REQUIREMENTS**

The following tables indicate the type of compliance monitoring required for each applicable emission limit. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

Table VI-A

S-1 Cupola

	Emission		Future	5-1 Cupola	Monitoring	Monitoring	Monitoring
Pollutant	Limit	FE	Effective	Emission Limit	Requirement	Frequency	Type
	Citation	Y/N	Date		Citation	(P/C/N)	
PM_{10}	6-301	Y		Ringelmann No.1	N/S	N	
	6-302	Y		20% Opacity	N/S	N	
	6-305	Y		Fallout of visible	N/S	N	
				particles			
	6-310	Y		0.15 gr/dscf	N/S	N	
	6-311	Y		40 lb/hr	N/S	N	
SO_2	9-1-301	N		Ground level SO ₂	Regulation	N	
				concentration	9-1-501		
	9-1-304	N		sulfur content of fuel	N/S	N	
				not to exceed 0.5%			
Lead	11-1-301	Y		15 lb/day	N/S	N	
	11-1-302	Y		ground level	N/S	N	
				concentration not to			
				exceed 1.0 ug/m ³			
				averaged over 24 hrs			

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VI. Applicable Emission Limits & Compliance Monitoring Reqs. (continued)

Table VI-B

S-4 Ductile Treating Station

	5-4 Ductue Treating Station										
Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type				
PM_{10}	6-301	Y		Ringelmann No.1	N/S	N					
	6-302	Y		20% Opacity	N/S	N					
	6-305	Y		Fallout of visible particles	N/S	N					
	6-310	Y		0.15 gr/dscf	N/S	N					
	6-311	Y		40 lb/hr	N/S	N					
Lead	11-1-301	Y		15 lb/day	N/S	N					
	11-1-302	Y		ground level concentration not to exceed 1.0 ug/m ³ averaged over 24 hrs	N/S	N					
SO ₂	9-1-301	N		Ground level SO ₂ concentration	Regulation 9-1-501	N					
	9-1-304	N		sulfur content of fuel not to exceed 0.5%	N/S	N					
	Condition #1783, part 2	Y		150 lb/day	Condition #1783, part 2	N					

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VI. Applicable Emission Limits & Compliance Monitoring Reqs. (continued)

Table VI-C

S-5 Ladle Lancing S-7 Mold Sandblast S-8 Bell Blowout

S-16 Pneumatic Cement Transport System

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
PM_{10}	6-301	Y		Ringelmann No.1	N/S	N	
	6-302	Y		20% Opacity	N/S	N	
	6-305	Y		Fallout of visible particles	N/S	N	
	6-310	Y		0.15 gr/dscf	N/S	N	
	6-311	Y		40 lb/hr	N/S	N	

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VI. Applicable Emission Limits & Compliance Monitoring Reqs. (continued)

Table VI-D

S-15 Annealing Oven

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
PM_{10}	6-301	Y		Ringelmann No.1	N/S	N	
	6-302	Y		20% Opacity	N/S	N	
	6-305	Y		Fallout of visible particles	N/S	N	
	6-310	Y		0.15 gr/dscf	N/S	N	
	6-311	Y		40 lb/hr	N/S	N	
SO_2	9-1-301	N		Ground level SO ₂ concentration	Regulation 9-1-501	N	
	9-1-304	N		sulfur content of fuel not to exceed 0.5%	N/S	N	

Table VI-E

S-32 Pneumatic Dust Transport System

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
PM_{10}	6-301	Y		Ringelmann No.1	N/S	N	
	6-302	Y		20% Opacity	N/S	N	
	6-305	Y		Fallout of visible particles	N/S	N	
	6-310	Y		0.15 gr/dscf	N/S	N	
	6-311	Y		40 lb/hr	N/S	N	
	Condition #2676, part 3	Y		grain loading from A- 19 Baghouse not to exceed 0.10 gr/dscf	N/S	N	
Lead	11-1-301	Y		15 lb/day	N/S	N	
	11-1-302	Y		ground level concentration not to exceed 1.0 ug/m ³ averaged over 24 hrs	N/S	N	

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VI. Applicable Emission Limits & Compliance Monitoring Reqs. (continued)

Table VI-F

S-33 Gasoline Dispensing Facility (Non-Retail)

Pollutant	Emission Limit	FE	Future Effective	Emission Limit	Monitoring Requirement	Monitoring Frequency	Monitoring Type
	Citation	Y/N	Date		Citation	(P/C/N)	
POC	8-7-301.2	Y		95% (wt) organic vapor recovery efficiency	Regulation 8-7-602	N/S	Р
	8-7-301.6	Y		all vapor recovery equipment maintained to be leak-free and vapor tight	N/S	N/S	P

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VI. Applicable Emission Limits & Compliance Monitoring Reqs. (continued)

Table VI-G

S-39 Ductile Treating Unit

S-59 Ductue Treating Unit							
Pollutant	Emission Limit	FE	Future Effective	Emission Limit	Monitoring Requirement	Monitoring Frequency	Monitoring Type
	Citation	Y/N	Date		Citation	(P/C/N)	
PM ₁₀	6-301	Y		Ringelmann No.1	N/S	N	
	6-302	Y		20% Opacity	N/S	N	
	6-305	Y		Fallout of visible	N/S	N	
				particles			
	6-310	Y		0.15 gr/dscf	N/S	N	
	6-311	Y		40 lb/hr	N/S	N	
Lead	11-1-301	Y		15 lb/day	N/S	N	
	11-1-302	Y		ground level	N/S	N	
				concentration not to			
				exceed 1.0 ug/m ³			
				averaged over 24 hrs			

Table VI-H

S-40 Portable Abrasive Blasting Unit #1 S-41 Portable Abrasive Blasting Unit #2

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
PM_{10}	6-301	Y		Ringelmann No.1	N/S	N	
	6-302	Y		20% Opacity	N/S	N	
	6-305	Y		Fallout of visible	N/S	N	
				particles			
	6-310	Y		0.15 gr/dscf	N/S	N	
	6-311	Y		40 lb/hr	N/S	N	
	12-4-301	Y		Ringelmann No. 1 Limitation	N/S	N	
_	12-4-302	Y		Ringelmann No. 2 Limitation	N/S	N	

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VII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally found in Section 600 of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section V - Applicable Emission Limits & Compliance Monitoring Requirements.

Table VII

Applicable Requirement	Description of Requirement	Acceptable Test Methods	SIP- Approved
SIP 6-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of	Approved
		Visible Emissions	in SIP
BAAQMD	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of	Approved
6-301		Visible Emissions	in SIP
BAAQMD	Opacity Limitation	Manual of Procedures, Volume V, Continuous	Y
6-302		Emission Monitoring	
BAAQMD &	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15,	N
SIP 6-310		Particulates Sampling	
BAAQMD &	General Operations	Manual of Procedures, Volume IV, ST-15,	N
SIP 6-311		Particulates Sampling	
BAAQMD &	Exemption, process subject to	Manual of Procedures, Volume IV, ST-7, Non-	N
SIP 8-1-110.3	Regulation 8, Rule 2 or 4	Methane Organic Carbon Sampling or	
		EPA Method 25 or 25A.	Y
BAAQMD &	Miscellaneous Operations	Manual of Procedures, Volume IV, ST-7, Non-	N
SIP 8-2-301		Methane Organic Carbon Sampling or	
		EPA Method 25 or 25A.	Y
BAAQMD	Exemption, Low Vapor Pressure	Manual of Procedures, Volume III, Method 28,	N
8-5-117		Determination of Vapor Pressure of Organic Liquids	
		from Storage Tanks	
BAAQMD &	Phase I Requirements	Manual of Procedures, Volume III, Method 13,	Y
SIP 8-7-301.1		Determination of the Reid Vapor Pressure of	
		Petroleum Products	
BAAQMD &	Phase I Requirements	Manual of Procedures, Volume IV, ST-36, Gasoline	Approved
SIP 8-7-301.2		Dispensing Facility Phase I Volumetric Efficiency	in rule
BAAQMD &	Phase I Requirements	Manual of Procedures, Volume IV, ST-30, Gasoline	Y
SIP 8-7-301.6		Vapor Recovery Leak Test Procedure	
BAAQMD &	Certification of New Installations	Manual of Procedures, Volume IV, ST-27, Gasoline	Y
SIP 8 -7-404		Dispensing Facility Dynamic Back Pressure	

continued

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VII. Test Methods (continued)

Table VII (continued)

Applicable			SIP-
Requirement	Description of Requirement	Acceptable Test Methods	Approved
BAAQMD &	Fuel Burning (Liquid and Solid	Manual of Procedures, Volume III, Method 10,	Approved
SIP 9-1-304	Fuels)	Determination of Sulfur in Fuel Oils.	in rule
BAAQMD &	Daily Limitation, Lead	Manual of Procedures, Volume IV, ST-9, Lead	N
SIP 11-1-301			
SIP 12-4-301	Ringelmann 1 Limitations	Manual of Procedures, Volume I, Part 1, Evaluation	Approved
		of Visible Emissions	in SIP
BAAQMD	Ringelmann 2 Limitations	Manual of Procedures, Volume I, Part 1, Evaluation	Approved
12-4-302		of Visible Emissions	in SIP
BAAQMD &	Standard for abrasives before	Test Method No. California 371-A	Approved
SIP 12-4-	blasting		in Rule
305.1			
BAAQMD &	Standard for abrasives after	Test Method No. California 371-A	Approved
SIP 12-4-	blasting		in Rule
305.1			

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VIII. GLOSSARY

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

CAA

The federal Clean Air Act

CAAOS

California Ambient Air Quality Standards

CEQA

California Environmental Quality Act

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

\mathbf{CO}

Carbon Monoxide

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date. Used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District Regulations.

Federally Enforceable, FE

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60, (NSPS), Part 61, (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid

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VIII. Glossary (continued)

Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

HAP

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

Major Facility

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

NAAOS

National Ambient Air Quality Standards

NESHAPS

National Emission Standards for Hazardous Air Pollutants. Contained in 40 CFR Part 61.

NMHC

Non-methane Hydrocarbons

NOx

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

NSR

New Source Review. A federal program for preconstruction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment". Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well

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VIII. Glossary (continued)

as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any on site contemporaneous emission reduction credits. Applies to emissions of POC, NOx, PM10, and SO2.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

\mathbf{PM}

Total Particulate Matter

PM10

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO₂

Sulfur dioxide

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

VOC

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VIII. Glossary (continued)

Volatile Organic Compounds

Units of Measure:

bhp brake-horsepower Btu **British Thermal Unit** grams g = gal gallon = hp horsepower hr hour = lb pound inches in max maximum m^2 = square meter minute min = million MM = parts per million, by volume ppmv parts per million, by weight ppmw = psia pounds per square inch, absolute = pounds per square inch, gauge psig =

= yr year

scfm

standard cubic feet per minute